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Attorneys for Creditor
GER HOSPITALITY, LLC

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION

-and-

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

X Affects both Debtors

* All papers shall be filed in the Lead Case,
No. 19-30088(DM).

Bankruptcy Case No. 19-30088 (DM)
Chapter 11

(Lead Case)

(Jointly Administered)

JOINDER OF GER HOSPITALITY, LLC IN
SUPPORT OF MOTION OF WILLIAM B.
ABRAMS FOR RECONSIDERATION AND
RELIEF FROM THE ORDERS PURSUANT
TO 11 U.S.C. 363(b) AND RULE 9024
APPROVING PROPOSED STATEMENT
FOR DEBTORS' JOINT CHAPTER 11 PLAN
OF REORGANIZATION [Dkt. 6340]

I

INTRODUCTION

“Let the jury consider their verdict,” the King said, for about the twentieth time that day.

“No, no!” said the Queen. “Sentence first – verdict afterward.”

“Stuff and nonsense!” said Alice loudly.

Lewis Carroll, *Alice’s Adventures in Wonderland*.

II
ARGUMENT

Stuff and nonsense, indeed. But the fire victims are placed in the same untenable position by having to vote on the Debtors' plan before there has been a complete disclosure of all of the facts necessary to permit those claimants to make an informed decision. The material omission in the Disclosure Statement, as well as in the amendment thereto, is that there is no discussion whatsoever about the impact of the current financial crisis and its effect on the Debtors' plan – in short, the fire victims' Trust Fund, which is required under the Debtors/TCC RSA to have a total value on the "effective date" of \$13.5 Billion (half in cash – paid in three installments, the last two without interest – and half in PGE stock) is no longer valued at that total amount, but is worth much less because of the collapse of the economy and will continue to decline as the economy worsens. But none of these facts was disclosed to the fire victims in the Disclosure Statement or the amendment. That is why GER joins the Abram's motion for reconsideration.

However, should this Court not reconsider its prior approval orders, then GER respectfully requests that the Court order that a supplemental Disclosure Statement be sent to the fire victims informing them of the changes in the value of the Debtors' plan due to the downturn in the economy.

Dated: March 31, 2020

LAW OFFICES OF FRANCIS O. SCARPULLA

By /s/ Francis O. Scarpulla
Francis O. Scarpulla

HALLISEY & JOHNSON, P.C.

By /s/ Jeremiah F. Hallisey
Jeremiah F. Hallisey

Attorney for Creditor
GER HOSPITALITY, LLC

1 **CERTIFICATE OF SERVICE**

2

3 I, C.P. Cusick, declare as follows:

4 I am a citizen of the United States and over the age of eighteen (18) years and not a party to
5 the within action. My business address is 456 Montgomery Street, 17th Floor, San Francisco, CA
6 94014.

7 On March 31, 2020, I served document(s) described as:

8 **JOINDER OF GER HOSPITALITY, LLC IN SUPPORT OF**
9 **MOTION OF WILLIAM B. ABRAMS FOR**
10 **RECONSIDERATION AND RELIEF FROM THE ORDERS**
11 **PURSUANT TO 11 U.S.C. 363(b) AND RULE 9024**
12 **APPROVING PROPOSED STATEMENT FOR DEBTORS’**
13 **JOINT CHAPTER 11 PLAN OF REORGANIZATION [Dkt.**
14 **6340]**

15 on the interested parties in this action as follows:

16 [] BY MAIL: Service was accomplished by placing the document(s) listed above in a sealed
17 envelope with postage thereon fully prepaid, in the United States mail at San Francisco,
18 addressed as set forth above.

19 [X] BY E-MAIL/NEF: Service was accomplished through the Notice of Electronic Filing
20 (“NEF”) for all parties and counsel who are registered ECF Users and those identified
21 below:

22 I declare under penalty of perjury under the laws of the United States of America that the
23 above is true and correct. This declaration was executed on March 31, 2020 at San Francisco,
24 California.

25 /s/ C.P. Cusick
26 C.P. Cusick